

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

TASHA MILLS,)	CASE NO. 1:22-CV-2292
)	
Plaintiff,)	JUDGE
)	
v.)	REPORT OF PARTIES' PLANNING
)	MEETING UNDER
MOUNT ROYAL VILLA, LLC DBA)	FED. R. CIV. P. 26(f) AND LR
THE PAVILION REHABILITATION)	16.3(b)(3)
AND NURSING CENTER.,)	
)	
Defendant.		

1. Pursuant to Fed. R. Civ. P. 26(f) and L.R. 16.3(b)(3), a meeting was held on April 6, 2023 and was attended by:

Jamie Bailey and Rachel Sabo Friedmann, counsel for plaintiff Tasha Mills

Shannon Henry counsel for defendant Mount Royal Villa, LLC

2. Defendants served the pre-discovery disclosures required by Fed. R. Civ. P. 26(a)(1) and the Court's prior order on April 3, 2023. As of the date of this report, Plaintiff has not served these disclosures.

3. The parties recommend the following track:

_____ Expedited **X** Standard _____ Complex
_____ Administrative _____ Mass Tort

4. This case is suitable for one or more of the following Alternative Dispute Resolution ("ADR") mechanisms:

_____ Early Neutral Evaluation _____ Mediation _____ Arbitration
_____ Summary Jury Trial _____ Summary Bench Trial **X** Not Suitable for ADR

5. The parties _____ do/ **X** do not consent to the jurisdiction of the United States Magistrate Judge pursuant to 28 U.S.C. 636(c).

6. The parties agree that this case does not involve electronic discovery.

7. The parties are in negotiations for a settlement and recommend that all discovery be stayed.
8. Other matters for attention of the Court: The parties have reached agreement on damages for this matter and are discussing attorneys' fees. Plaintiff's counsel demands \$10,000 in attorneys' fees and at this time Defendant has countered with \$5,000.

Attorneys for Plaintiff

/s/ Rachel Sabo Friedman

Jamie R. Bailey
Rachel Sabo Friedmann
Peter G. Friedmann
The Friedmann Firm LLC
3740 Ridge Mill Drive
Hilliard, OH 43026

Attorneys for Defendant

/s/ Shannon Henry

Shannon Henry
Joseph N. Gross
Benesch Friedlander Coplan and Aronoff LLP
200 Public Square, Suite 2300
Cleveland, OH 44114

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of April 2023, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties who have made an appearance by operation of the Court's electronic filing system and those parties may access the filing through the Court's system.

/s/ Shannon Henry

One of the Attorneys for Defendants